

# Goss • Samford PLLC



Attorneys at Law

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May 20, 2013

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MAY 22 2013

PUBLIC SERVICE  
COMMISSION

Mr. Jeffrey Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

Re: PSC Case No. 2013-00158, In the Matter of: South Kentucky RECC  
Alleged Failure to Comply with KRS 278.042

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of my Motion for Extension of Time as counsel for South Kentucky Rural Electric Cooperative Corporation. Please return a file-stamped copy to me.

Do not hesitate to contact me if you have any questions.

Very truly yours,

Mark David Goss

Enclosures

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Correspondence\Ltr. to Jeff Derouen - 130520.docx

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

SOUTH KENTUCKY RECC	)	
	)	
_____	)	CASE NO.
	)	2013-00158
ALLEGED FAILURE TO COMPLY	)	
WITH KRS 278.042	)	

**MOTION FOR EXTENSION OF TIME**

Comes now South Kentucky Rural Electric Cooperative Corporation (“SKRECC”), by counsel, and moves the Kentucky Public Service Commission (the “Commission”) for an Order extending the time by which SKRECC must file a response to the Order of May 6, 2013.

In support of this Motion, SKRECC states that the Commission entered an Order on May 6, 2013 setting forth numerous alleged violations of the National Electric Safety Code, SKRECC’s Safety Manual and KRS 278.042 involving an injury accident which occurred on July 30, 2012 involving SKRECC employee, Ronnie Parrett. That Order provides that SKRECC shall file a response to the allegations contained therein by May 24, 2013.

However, because of the several alleged violations contained in the Commission’s Order, the need for counsel to interview and consult with several of SKRECC’s staff, and the fact that undersigned counsel is required to be away from his office for at least two days this week, it is impracticable for SKRECC to file its response by the deadline contained in the Order.

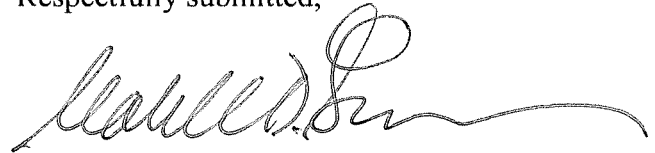
SKRECC respectfully requests that the Commission allow an additional fourteen (14) days for SKRECC to file its response after which time an informal conference can be scheduled.

Currently, the Commission has scheduled a hearing date in this case for August 27, 2013. The requested fourteen (14) day extension should in no way affect this hearing date. This motion is not made for the purpose of hindrance or delay, but so that SKRECC can file a substantive response addressing the Commission's Order.

WHEREFORE, SKRECC respectfully requests the Commission to enter an Order allowing an additional fourteen (14) days to June 7, 2013 within which to file its response.

Dated: May 10, 2013

Respectfully submitted,



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Electric Cooperative Corporation*